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Enforcement and Compliance
Assurance Division

UPS# 1Z E93 A02 24 9286 8488

July 30, 2019

Colorado Department of Public Health & Environment
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246

RE: Semi-annual Reports (NSPS Subparts OOOO & OOOOa)
Gilcrest Gas Plant (Permit#07WE0881)

Dear Sir or Madam:

Attached are Semi-annual Reports (SAR) covering the Leak Detection and Repair program (LDAR) for the Gilcrest Gas Plant, located in Weld County, Colorado. The reports cover the period from January 1, 2019 through June 30, 2019, and include LDAR programs for the following regulations:

- NSPS Subpart OOOO
- NSPS Subpart OOOOa

OOOO Process Units

The LDAR program at the facility transitioned from KKK to OOOO for eight (8) process units during the referenced time period due to Colorado Regulation 7 (XII.G.1) requirements. This regulatory change resulted in the leak definition of process unit components previously classified under KKK to decrease from 10,000 ppm to 500 ppm. Due to this change, numerous components which were not previously identified as leaking have now been identified, repaired and retested. Components which require a process unit shutdown for repairs increased as there were no process unit shutdowns at the facility between January 1, 2019, when the new leak definition went into effect, and June 30, 2019.

Additionally, a number of pressure relief valves (PRVs) have been identified which are leaking at rates greater than 500 ppm but less than 10,000 ppm. Following numerous repair attempts to reseal, lap and rebuild these PRVs, Aka's engineering team has determined that these valves may not be able to meet the 500 ppm leak threshold as they are hard seat valves with allowable leak rates under API 527 and ASME Section VIII. Aka is in the process of completing engineering and design reviews to replace these hard seat relief valves with soft seat relief valves which should be able to meet the 500 ppm leak threshold. Due to the facility's classification under OSHA Process Safety Management regulations (29 CFR § 1910.119), a Management of Change (MOC) process must be utilized to complete the valve upgrades which has caused the leaks to be delayed



beyond 15 days. Aka has been in communication with EPA Region 8 regarding how these valves should be classified during this time and is currently awaiting a response following submittal of written questions and a request for compliance assistance.

OOOOa Process Units

The four (4) process units regulated under OOOOa had no major changes during the reporting period, as retagging and documentation was completed during 2018. The OOOOa compliance documentation is attached in hard copy format and has also been submitted to EPA's Compliance and Emissions Data Reporting Interface (CEDRI) database using the *60.5442a(a) Semiannual Report Template*.

To meet the requirements of 40 CFR § 60.4(a), 40 CFR § 60.487 and Colorado Regulation Number 6, these reports have been submitted in duplicate to USEPA Region 8. Please let us know if you need further information or have additional questions. I may be reached by email at gstahnke@akaenergy.com, or by phone at (720) 946-0244.

Sincerely,

(b) (6)

Graham Stahnke
Sr. Environmental Compliance Specialist

Attachments as Described

cc: USEPA Region VIII Director, Air & Toxics Technical Enforcement Program, Office of Enforcement, Compliance and Environmental Justice, Mail Code 8ENF-AT, 1595 Wynkoop Street, Denver CO 80202-1129 (UPS Tracking# **1Z E93 A02 24 9687 8862**)

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS

SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST** Compliance Group: **CO2 Membrane Process**

Reporting Period: **1/1/2019 Through 6/30/2019** 7/8/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	1	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	1	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	1	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	1	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March		
April		
May		
June		

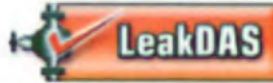


60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2018	Current Period Ending: 6/30/2019
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	47	47
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	0	0
Connectors 60.5422(a) & 60.487a (b)(5)	137	137
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/8/2019

Report Parameters

Reg: EPA60-0000

Compliance Grp: CO2 Membrane Process

Class: All Component Classes

Date: 1/1/2019 - 6/30/2019

Compliance Group	Class Description	Added	Deleted
CO2 Membrane Process	CONNECTOR	0	0
CO2 Membrane Process	POTENTIAL OPEN END	0	0
CO2 Membrane Process	PRESSURE RELIEF DEVICE	0	0
CO2 Membrane Process	VALVE	0	0

Compliance Repair Delay Report

Report Date: 1/1/2019 to 6/30/2019

Print Date: 7/26/2019 3:19:26PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: CO2 Membrane Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2561.02 2542	CONECT	0076 0076 Permeate Gas 100%	1/22/2019	1/27/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	2/15/2019
2569 2542	RELIEF	0076 0076 Permeate Gas 100%	2/15/2019	2/26/2019	ENGINEERING, DESIGN, AND PARTS ORDERED FOR SOFT SEAT VALVE REPLACEMENT	PER STEVE NESTOR	11/30/2019	

Number of Components Delayed for Compliance Group CO2 Membrane Process - 2

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Compression Process**

Reporting Period: **1/1/2019 Through 6/30/2019**

7/8/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	4	0	0	2	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	1	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	1	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March		
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2018	Current Period Ending: 6/30/2019
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	364	364
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	4	4
Connectors 60.5422(a) & 60.487a (b)(5)	2,539	2,536
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/8/2019

Report Parameters



Reg: EPA60-0000

Compliance Grp: Compression Process

Class: All Component Classes

Date: 1/1/2019 - 6/30/2019

Compliance Group	Class Description	Added	Deleted
Compression Process	COMPRESSOR	0	0
Compression Process	CONNECTOR	0	3
Compression Process	POTENTIAL OPEN END	1	0
Compression Process	PRESSURE RELIEF DEVICE	0	0
Compression Process	PUMP	0	0
Compression Process	VALVE	0	0

Compliance Repair Delay Report**Report Date: 1/1/2019 to 6/30/2019****Print Date: 7/26/2019 3:19:26PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA60-0000****Compliance Group: Compression Process**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
0609 2523	RELIEF	0008 0008 3RD Suct Disch to AC-108	2/12/2019	2/26/2019	ENGINEERING, DESIGN, AND PARTS ORDERED FOR SOFT SEAT VALVE REPLACEMENT	PER STEVE NESTOR	11/30/2019	4/12/2019

Number of Components Delayed for Compliance Group Compression Process - 1

(b) (6)

Signature of Owner/Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS

SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-OOOO

Company: **AKA ENERGY - GILCREST** Compliance Group: **Cryogenic Process**

Reporting Period: **1/1/2019 Through 6/30/2019** 7/8/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	1	1	0	5	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired ≤ 15 Days	0	0	0	0	1	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired ≤ 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired ≤ 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	1	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired ≤ 15 Days	0	1	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March		
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2018	Current Period Ending: 6/30/2019
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	275	273
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	4	4
Connectors 60.5422(a) & 60.487a (b)(5)	943	935
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/8/2019

Report Parameters

Reg: EPA60-0000

Compliance Grp: Cryogenic Process

Class: All Component Classes



Date: 1/1/2019 - 6/30/2019

Compliance Group	Class Description	Added	Deleted
Cryogenic Process	CONNECTOR	6	14
Cryogenic Process	POTENTIAL OPEN END	1	3
Cryogenic Process	PRESSURE RELIEF DEVICE	0	0
Cryogenic Process	PUMP	0	0
Cryogenic Process	VALVE	0	3

Compliance Repair Delay Report**Report Date: 1/1/2019 to 6/30/2019****Print Date: 7/26/2019 3:19:26PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA60-0000****Compliance Group: Cryogenic Process**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
1673 2525	RELIEF	0030 0030 E-440 Deeth Hir to T-1100 Deeth OVHD	2/14/2019	2/26/2019	ENGINEERING, DESIGN, AND PARTS ORDERED FOR SOFT SEAT VALVE REPLACEMENT	PER STEVE NESTOR	11/30/2019	4/11/2019
1598 2525	VALVE	0011 0011 Free Water-K/O V-109 to Filter Sep F-813	5/14/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	

Number of Components Delayed for Compliance Group Cryogenic Process - 2

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST** Compliance Group: **Inlet Gas Process**
Reporting Period: **1/1/2019 Through 6/30/2019** 7/8/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	1	3	0	1	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	1	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period 40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March		
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2018	Current Period Ending: 6/30/2019
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	528	526
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	1	1
Connectors 60.5422(a) & 60.487a (b)(5)	1,206	1,197
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/8/2019

Report Parameters



Reg: EPA60-0000

Compliance Grp: Inlet Gas Process

Class: All Component Classes

Date: 1/1/2019 - 6/30/2019

Compliance Group	Class Description	Added	Deleted
Inlet Gas Process	CONNECTOR	0	9
Inlet Gas Process	POTENTIAL OPEN END	1	0
Inlet Gas Process	PRESSURE RELIEF DEVICE	0	0
Inlet Gas Process	PUMP	0	0
Inlet Gas Process	VALVE	0	2

Compliance Repair Delay Report

Report Date: 1/1/2019 to 6/30/2019

Print Date: 7/26/2019 3:19:26PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: Inlet Gas Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
0092 2502B	VALVE	0001 0001 Inlet gathering to V-100/101/102	1/22/2019	1/27/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	2/28/2019

Number of Components Delayed for Compliance Group Inlet Gas Process - 1

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-O000

Company: **AKA ENERGY - GILCREST** Compliance Group: **NGL Y Grade Storage and Handlin**
Reporting Period: **1/1/2019 Through 6/30/2019** 7/8/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	1	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	2	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	2	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period 40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March		
April		
May		
June		



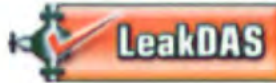
60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2018	Current Period Ending: 6/30/2019
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	339	338
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	8	8
Connectors 60.5422(a) & and 60.487a (b)(5)	1,198	1,188
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/8/2019

Report Parameters



Reg: EPA60-0000

Compliance Grp: NGL Y Grade Storage and
Handling Process

Date: 1/1/2019 - 6/30/2019

Class: All Component Classes

Compliance Group	Class Description	Added	Deleted
NGL Y Grade Storage and Handling Process	CONNECTOR	0	10
NGL Y Grade Storage and Handling Process	POTENTIAL OPEN END	0	3
NGL Y Grade Storage and Handling Process	PRESSURE RELIEF DEVICE	0	0
NGL Y Grade Storage and Handling Process	PUMP	0	0
NGL Y Grade Storage and Handling Process	VALVE	0	1

Compliance Repair Delay Report

Report Date: 1/1/2019 to 6/30/2019

Print Date: 7/26/2019 3:19:26PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: NGL Y Grade Storage and Handling Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
3087 2519A	RELIEF	0060 0060 NGL Y-Grade Gasoline - P-6 To Truck Load Rack	2/28/2019	2/28/2019	ENGINEERING, DESIGN, AND PARTS ORDERED FOR SOFT SEAT VALVE REPLACEMENT	PER STEVE NESTOR 11/30/2019		
2982.00 2519	RELIEF	0060 0060 NGL Y-Grade Gasoline - P-6 To Truck Load Rack	2/28/2019	2/28/2019	ENGINEERING, DESIGN, AND PARTS ORDERED FOR SOFT SEAT VALVE REPLACEMENT	PER STEVE NESTOR 11/30/2019		
2773.00 2535	VALVE	0060 0060 NGL Y-Grade Gasoline - P-6 To Truck Load Rack	2/21/2019	2/26/2019	ENGINEERING, DESIGN, AND PARTS ORDERED FOR SOFT SEAT VALVE REPLACEMENT	PER STEVE NESTOR 11/30/2019		3/22/2019

Number of Components Delayed for Compliance Group NGL Y Grade Storage and Handling Process - 3

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-OOOO

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Refrigeration Process**

Reporting Period: **1/1/2019 Through 6/30/2019**

7/10/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	2	16	0	1	11	1
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired ≤ 15 Days	2	12	0	1	8	1
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	1	2	1
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired ≤ 15 Days	0	0	0	0	2	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	16	0	2	1	1	1
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired ≤ 15 Days	10	0	2	0	0	1
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	1	0	0	1	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired ≤ 15 Days	0	1	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March		
April		
May		
June		



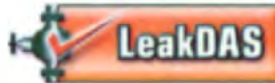
60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2018	Current Period Ending: 6/30/2019
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	723	726
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	7	7
Connectors 60.5422(a) & 60.487a (b)(5)	2,424	2,439
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/8/2019

Report Parameters



Reg: EPA60-0000

Compliance Grp: Refrigeration Process

Class: All Component Classes

Date: 1/1/2019 - 6/30/2019

Compliance Group	Class Description	Added	Deleted
Refrigeration Process	COMPRESSOR	0	0
Refrigeration Process	CONNECTOR	36	21
Refrigeration Process	POTENTIAL OPEN END	9	8
Refrigeration Process	PRESSURE RELIEF DEVICE	0	1
Refrigeration Process	PUMP	0	0
Refrigeration Process	VALVE	14	11

Compliance Repair Delay Report

Report Date: 1/1/2019 to 6/30/2019

Print Date: 7/26/2019 3:19:26PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: Refrigeration Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
1937.02 2515	CONNECT	0051 0051 NGL Y-Grade-Pumps10A/B DeethBtm toStorageTks	1/24/2019	1/29/2019	LEAK CLOSED PER 60.482-9A(F)	PER STEVE NESTOR	11/30/2019	3/25/2019
1938.07 2515	CONNECT	0051 0051 NGL Y-Grade-Pumps10A/B DeethBtm toStorageTks	1/24/2019	1/29/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
1859.01 2515	CONNECT	0079 0079 Methanol 100%	1/28/2019	1/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2036.03 2513	CONNECT	0019 0019 E-420 Cold Gas Exch toT-1100 Deeth OVHD	1/29/2019	1/30/2019	REMOVED FROM SERVICE PER 670891 3/27/19	PER STEVE NESTOR	11/30/2019	3/27/2019
2040.04 2513	CONNECT	0019 0019 E-420 Cold Gas Exch toT-1100 Deeth OVHD	1/29/2019	1/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2041.01 2513	CONNECT	0019 0019 E-420 Cold Gas Exch toT-1100 Deeth OVHD	1/29/2019	1/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2156.01 2512	CONNECT	0017 0017 V-215 LP Sep to T-1100 Deethanizer OVHD	1/31/2019	1/31/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2187.00 2511	CONNECT	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	1/31/2019	1/31/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2247.02 2510	CONNECT	0032 0032 F-800 Inlet Gas Dust Filter toK-620 Regen CMP	3/25/2019	3/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	6/7/2019

Compliance Repair Delay Report**Report Date: 1/1/2019 to 6/30/2019****Print Date: 7/26/2019 3:19:26PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA60-0000****Compliance Group: Refrigeration Process**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2270.05 2509	CONNECT	0013 0013 Inlet Gas- Dehy V-110 to Dust Filter F-800	3/25/2019	3/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	4/11/2019
2048.02 2511	CONNECT	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	6/18/2019	6/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2043.02 2513	POE	0019 0019 E-420 Cold Gas Exch toT-1100 Deeth OVHD	1/29/2019	1/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2156.02 2512	POE	0017 0017 V-215 LP Sep to T-1100 Deethanizer OVHD	1/31/2019	1/31/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
1861 2515	PUMP	0051 0051 NGL Y-Grade-Pumps10A/B DeethBtm toStorageTks	5/14/2019	5/29/2019	PUMP REPAIRED ONCE PARTS RECEIVED	PER STEVE NESTOR	6/30/2019	6/12/2019
1884 2515	PUMP	0051 0051 NGL Y-Grade-Pumps10A/B DeethBtm toStorageTks	5/14/2019	5/14/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2053 2511	RELIEF	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	2/25/2019	2/26/2019	ENGINEERING, DESIGN, AND PARTS ORDERED FOR SOFT SEAT VALVE REPLACEMENT	PER STEVE NESTOR	11/30/2019	
2033 2513	VALVE	0019 0019 E-420 Cold Gas Exch toT-1100 Deeth OVHD	1/29/2019	1/30/2019	REMOVED FROM SERVICE PER 670891 3/27/19	PER STEVE NESTOR	11/30/2019	3/27/2019
2171.00 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	1/31/2019	1/31/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	

Compliance Repair Delay Report

Report Date: 1/1/2019 to 6/30/2019

Print Date: 7/26/2019 3:19:26PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: Refrigeration Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
1927 2515	VALVE	0051 0051 NGL Y-Grade-Pumps10A/B DeethBtm toStorageTks	2/19/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2122 2511	VALVE	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	2/25/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2116 2511	VALVE	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	2/26/2019	2/26/2019	LEAK CLOSED PER 60.482-9A(F)	PER STEVE NESTOR	11/30/2019	4/11/2019
2292 2508	VALVE	0013 0013 Inlet Gas- Dehy V-110 to Dust Filter F-800	2/26/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2156.00 2512	VALVE	0017 0017 V-215 LP Sep to T-1100 Deethanizer OVHD	2/26/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2172.00 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	2/26/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2173.00 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	2/26/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2174.00 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	2/26/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2177.00 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	2/26/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	

Compliance Repair Delay Report

Report Date: 1/1/2019 to 6/30/2019

Print Date: 7/26/2019 3:19:26PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: Refrigeration Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2030 2513	VALVE	0019 0019 E-420 Cold Gas Exch to T-1100 Deeth OVHD	2/27/2019	2/27/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	3/26/2019
2037 2513	VALVE	0019 0019 E-420 Cold Gas Exch to T-1100 Deeth OVHD	2/27/2019	2/27/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2041 2513	VALVE	0019 0019 E-420 Cold Gas Exch to T-1100 Deeth OVHD	2/27/2019	2/27/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	3/27/2019
2276 2509	VALVE	0013 0013 Inlet Gas- Dehy V-110 to Dust Filter F-800	4/16/2019	4/29/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2180.00R 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	5/22/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2181.00R 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	5/22/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2181.0A 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	5/22/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2181.0B 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	5/22/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2182.00R 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	5/22/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	

Compliance Repair Delay Report

Report Date: 1/1/2019 to 6/30/2019

Print Date: 7/26/2019 3:19:26PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: Refrigeration Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2183 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	5/22/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2185 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	5/22/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2186 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	5/22/2019	5/30/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	
2126 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	6/7/2019	6/10/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	

Number of Components Delayed for Compliance Group Refrigeration Process - 40

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Sulfatreat Process**

Reporting Period: **1/1/2019 Through 6/30/2019**

7/8/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	3	1	0	1	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	1	1	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	1	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	1	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	1	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March		
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2018	Current Period Ending: 6/30/2019
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	194	194
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	0	0
Connectors 60.5422(a) & 60.487a (b)(5)	492	493
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/8/2019

Report Parameters



Reg: EPA60-0000

Compliance Grp: Sulfatreat Process

Class: All Component Classes

Date: 1/1/2019 - 6/30/2019

Compliance Group	Class Description	Added	Deleted
Sulfatreat Process	CONNECTOR	1	0
Sulfatreat Process	POTENTIAL OPEN END	0	0
Sulfatreat Process	PRESSURE RELIEF DEVICE	0	0
Sulfatreat Process	VALVE	0	0

Compliance Repair Delay Report

Report Date: 1/1/2019 to 6/30/2019

Print Date: 7/26/2019 3:19:26PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: Sulfatreat Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2410.01 2507	CONNECT	0008 0008 3RD Suct Disch to AC-108	2/26/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	4/3/2019
0136 2507	RELIEF	0044 0044 CMP C 1-5 To V-270 HP Condensate Tank	2/14/2019	2/26/2019	PROCESS UNIT SHUTDOWN REQUIRED	PER STEVE NESTOR	11/30/2019	3/26/2019
0217 2538	VALVE	0009 0009 Sulfatreat from V-814/815 to F-812	2/14/2019	2/26/2019	LEAK CLOSED PER 60.482-9A(F)	PER STEVE NESTOR	11/30/2019	4/12/2019

Number of Components Delayed for Compliance Group Sulfatreat Process - 3

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Truck Loading Process Area**

Reporting Period: **1/1/2019 Through 6/30/2019**

7/8/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March		
April		
May		
June		



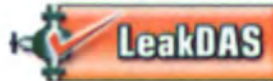
60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2018	Current Period Ending: 6/30/2019
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	60	59
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	0	0
Connectors 60.5422(a) & 60.487a (b)(5)	372	372
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/8/2019

Report Parameters



Reg: EPA60-0000

Compliance Grp: Truck Loading Process Area

Class: All Component Classes

Date: 1/1/2019 - 6/30/2019

Compliance Group	Class Description	Added	Deleted
Truck Loading Process Area	CONNECTOR	0	0
Truck Loading Process Area	POTENTIAL OPEN END	0	0
Truck Loading Process Area	PRESSURE RELIEF DEVICE	0	0
Truck Loading Process Area	PUMP	0	0
Truck Loading Process Area	VALVE	0	1

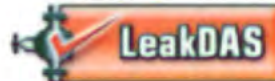
Compliance Component Summary (R800)

Report Date: 7/8/2019

Report Parameters

Regulation: EPA60-0000

Compliance Group: All Compliance Groups



Reporting Period: 6/30/2019 - 6/30/2019

EPA60-0000 : CO2 Membrane Process

Class	Chemical State	Category	Design	Exempt	Count
CONECT	GV	Normal	Normal	No	137
POE	GV	Normal	Normal	No	34
RELIEF	GV	Normal	NDE	No	1
VALVE	GV	Normal	Normal	No	47
					219

EPA60-0000 : Compression Process

Class	Chemical State	Category	Design	Exempt	Count
COMPR	GV	Normal	Normal	Yes	3
CONECT	GV	Normal	Normal	No	1,017
CONECT	GV	Normal	Normal	Yes	330
CONECT	LL	Normal	Normal	No	1,188
CONECT	LL	Normal	Normal	Yes	1
POE	GV	Normal	Normal	No	174
POE	GV	Normal	Normal	Yes	29
POE	LL	Normal	Normal	No	60
PUMP	LL	Normal	Normal	No	4
RELIEF	GV	Normal	NDE	No	18
RELIEF	GV	Normal	NDE	Yes	6
RELIEF	LL	Normal	Normal	Yes	1
VALVE	GV	Normal	NDE	No	3
VALVE	GV	Normal	NDE	Yes	4
VALVE	GV	Normal	Normal	No	193
VALVE	GV	Normal	Normal	Yes	53
VALVE	LL	Normal	NDE	No	6
VALVE	LL	Normal	Normal	No	118
					3,208

EPA60-0000 : Cryogenic Process

Class	Chemical State	Category	Design	Exempt	Count
CONECT	GV	Normal	Normal	No	340
CONECT	LL	Normal	Normal	No	595
POE	GV	Normal	Normal	No	49

Compliance Component Summary (R800)

Report Date: 7/8/2019

Report Parameters

Regulation: EPA60-0000



Compliance Group: All Compliance Groups

Reporting Period: 6/30/2019 - 6/30/2019

POE	LL	Normal	Normal	No	59
PUMP	LL	Normal	Normal	No	4
RELIEF	GV	Normal	NDE	No	2
RELIEF	LL	Normal	Normal	Yes	2
VALVE	GV	Normal	NDE	No	4
VALVE	GV	Normal	Normal	No	102
VALVE	LL	Normal	NDE	No	2
VALVE	LL	Normal	Normal	No	171
					1,330

EPA60-0000 : Inlet Gas Process

Class	Chemical State	Category	Design	Exempt	Count
CONECT	GV	Normal	Normal	No	868
CONECT	GV	Normal	Normal	Yes	29
CONECT	LL	Normal	Normal	No	294
CONECT	LL	Normal	Normal	Yes	6
POE	GV	Normal	Normal	No	128
POE	GV	Normal	Normal	Yes	5
POE	LL	Normal	Normal	No	30
POE	LL	Normal	Normal	Yes	1
PUMP	LL	Normal	Normal	No	1
RELIEF	GV	Normal	NDE	No	11
RELIEF	LL	Normal	Normal	Yes	4
VALVE	GV	Normal	NDE	No	1
VALVE	GV	Normal	NDE	Yes	1
VALVE	GV	Normal	Normal	No	372
VALVE	GV	Normal	Normal	Yes	10
VALVE	LL	Normal	Normal	No	143
VALVE	LL	Normal	Normal	Yes	1
					1,905

EPA60-0000 : NGL Y Grade Storage and Handling Process

Class	Chemical State	Category	Design	Exempt	Count
CONECT	GV	Normal	Normal	No	642
CONECT	GV	Normal	Normal	Yes	1
CONECT	LL	Normal	Normal	No	545

Compliance Component Summary (R800)

Report Date: 7/8/2019

Report Parameters

Regulation: EPA60-O000



Compliance Group: All Compliance Groups

Reporting Period: 6/30/2019 - 6/30/2019

POE	GV	Normal	Normal	No	77
POE	GV	Normal	Normal	Yes	1
POE	LL	Normal	Normal	No	64
PUMP	LL	Normal	Normal	No	8
RELIEF	GV	Normal	NDE	No	12
VALVE	GV	Normal	NDE	No	1
VALVE	GV	Normal	NDE	Yes	2
VALVE	GV	Normal	Normal	No	179
VALVE	GV	Normal	Normal	Yes	5
VALVE	LL	Normal	Normal	No	154
					1,691

EPA60-O000 : Refrigeration Process

Class	Chemical State	Category	Design	Exempt	Count
COMPR	GV	Normal	Normal	Yes	4
CONECT	GV	Difficult	Normal	No	121
CONECT	GV	Normal	Normal	No	1,121
CONECT	LL	Difficult	Normal	No	44
CONECT	LL	Normal	Normal	No	1,153
POE	GV	Difficult	Normal	No	21
POE	GV	Normal	Normal	No	124
POE	LL	Difficult	Normal	No	11
POE	LL	Normal	Normal	No	136
PUMP	LL	Normal	Normal	No	7
RELIEF	GV	Normal	NDE	No	22
RELIEF	LL	Normal	Normal	Yes	4
VALVE	GV	Difficult	Normal	No	1
VALVE	GV	Normal	NDE	No	2
VALVE	GV	Normal	Normal	No	379
VALVE	LL	Difficult	Normal	No	1
VALVE	LL	Normal	Normal	No	345
					3,496

EPA60-O000 : Sulfatreat Process

Class	Chemical State	Category	Design	Exempt	Count
CONECT	GV	Normal	Normal	No	358

Compliance Component Summary (R800)

Report Date: 7/8/2019

Report Parameters

Regulation: EPA60-0000

Compliance Group: All Compliance Groups



Reporting Period: 6/30/2019 - 6/30/2019

CONECT	LL	Normal	Normal	No	135
POE	GV	Normal	Normal	No	55
POE	LL	Normal	Normal	No	16
RELIEF	GV	Normal	NDE	No	7
RELIEF	LL	Normal	Normal	Yes	1
VALVE	GV	Normal	Normal	No	137
VALVE	LL	Normal	Normal	No	57
					766

EPA60-0000 : Truck Loading Process Area

Class	Chemical State	Category	Design	Exempt	Count
CONECT	GV	Normal	Normal	No	224
CONECT	LL	Normal	Normal	No	148
POE	GV	Normal	Normal	No	9
POE	LL	Normal	Normal	No	9
RELIEF	LL	Normal	Normal	Yes	6
VALVE	GV	Normal	Normal	No	34
VALVE	LL	Normal	Normal	No	25
					455
Grand Total					13,070